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FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 12-00614-RMW
)	
Plaintiff,)	STIPULATION AND []
)	ORDER CONTINUING HEARING DATE
vs.)	AND EXCLUDING TIME UNDER THE
)	SPEEDY TRIAL ACT
AMIT GANDTORA,)	
)	
Defendants.)	
_____)	

STIPULATION

Defendant Amit Gandotra, by and through Assistant Federal Public Defender Varell L. Fuller, and the United States, by and through Assistant United States Attorney Matthew A. Parrella, hereby stipulate that, with the Court's approval, the status hearing currently set for Monday, May 20, 2013, at 9:00 a.m., shall be continued to Monday, June 24, 2013, at 9:00 a.m.

The reason for the requested continuance is defense counsel requires additional time to effectively prepare and to conduct further investigation. Additionally, further time is needed to permit the parties additional time to address factual issues relevant to the parties on-going discussions about the terms of a possible negotiated disposition.

1 For the foregoing reasons, the parties jointly request and agree to an exclusion of the time
2 between May 20, 2013, and June 24, 2013, under the Speedy Trial Act, 18 U.S.C. §
3 3161(h)(7)(A) and (B)(iv), for effective preparation by defense counsel.

4 IT IS SO STIPULATED.

5 Dated: May 14, 2013

6 _____/s/_____
VARELL L. FULLER
Assistant Federal Public Defender

8 Dated: May 14, 2013

9 _____/s/_____
MATTHEW A. PARRELLA
Assistant United States Attorney

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16 **[] ORDER**

17 GOOD CAUSE APPEARING, upon stipulation of the parties, IT IS HEREBY
18 ORDERED that the hearing currently set for Monday, May 20, 2013, shall be continued to
19 Monday, June 24, 2013, at 9:00 a.m.

20 THE COURT FINDS that failing to exclude the time between May 20, 2013, and June
21 24, 2013, would unreasonably deny counsel for Mr. Gandotra reasonable time necessary for
22 effective preparation, taking into account the exercise of due diligence. See 18 U.S.C. §
23 3161(h)(7)(B)(iv).

24 THE COURT FURTHER FINDS that the ends of justice served by excluding the time
25 between May 20, 2013, and June 24, 2013, from computation under the Speedy Trial Act
26 outweigh the interests of the public and the defendants in a speedy trial.

1 THEREFORE, IT IS HEREBY ORDERED that the time between May 20, 2013, and
2 June 24, 2013, shall be excluded from computation under the Speedy Trial Act, 18 U.S.C. §
3 3161(h)(7)(A) and (B)(iv).

4 IT IS SO ORDERED.

5 Dated: May 16, 2013


THE HONORABLE RONALD M. WHYTE
United States District Court Judge